

04-24-CV-362
Plaintiff
Defendant
CC

FW 40000294S

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

Patricia A. Davidson

Plaintiff

v.

4-24 CV-362-0

Civil Action No.

Credit Corp Solutions Inc

Defendant

COMPLAINT

INTRODUCTION

This is a civil action for Actual, Punititive, Statutory damages and cost brought by Patricia A. Davidson hereinafter, an individual consumer, against Defendants, Credit Corp Solutions Inc. For Violations of The Fair Credit Reporting Act 15 U.S.C § 1681 et seq.

* Attach additional pages as needed.

Date

04-19-2024

Signature

Patricia A. Davidson

Print Name

Patricia A. Davidson

Parties

1. Plaintiff, Patricia A. Davidson is a Natural person and consumer as defined by 15 U.S.C 1681a(c), residing in Fort Worth, Texas at address 805 Heights Drive Apt F Upon information and belief, Credit Corp Solutions Inc is a Philippines Corporation.
2. Defendant Credit Corp Solutions Inc accepts service of process through its Registered Agent: Corporation Service Company dba CSC 211 E. 7th Street, Suite 620 Austin, TX 78701-3218.
3. The acts of Defendants described in this complaint were performed by Defendants or on Defendants' behalf by its Owners, Office, Agents, and/or employees acting within the scope of their actual or apparent authority. As such all References to "Defendants" in this complaint shall be Defendants or their Owners, Officers, agents, and/or employees.

Basis of Jurisdiction

4. Jurisdiction of this Court arises under 15 U.S.C § 1681(p) and 28 U.S.C§ 1331. The Venue is proper in this Judicial District pursuant to 28 U.S.C 1391(b)(1) and 28 U.S.C§ 1391(b)(2) because a substantial part of events, omissions, or conduct giving rise to the Plaintiff's claim which occurred in this Judicial District. Defendants transact business in Fort Worth, TX. The court has supplemental jurisdiction over state law claims pursuant to 28 U.S.C§ 1337.

Factual Allegations **Existence of a Consumer Report**

5. On or about 03/18/2024 a Consumer Report Pertaining to Plaintiff was generated and maintained by Experian, a consumer reporting agency as defined by 15 U.S.C§ 1681(a)(f). In the report, Plaintiff observed unauthorized inquiries from Defendant.

Count 1 Violation of the Fair Credit Reporting Act **15 U.S.C§ 1681b(f) Defendant Credit corp Solutions Inc**

6. Defendant Credit Corp Solutions Inc. accessed the plaintiff's Consumer report
07/22/2023,08/12/2023,08/13/2023,09/05/2023,09/06/2023,09/21/2023,09/30/2023
10/05/2023,10/06/2023,12/29/2023,01/02/2024,03/01/2024. See Exhibit A

Lack of Permissible Statutory Purpose

7. Defendants Credit Corp Solutions Inc accessed Plaintiff's consumer report without permissible purpose, as required by 15 U.S.C§ 1681 b(f). Discovery will show the plaintiff Had no existing business relationship, contractual obligations, or any transactions with Defendants Credit Corp Solutions Inc that would allow for such inquiries under 15 U.S.C§ 1681(a)(3)(A) or any provision.

8. Upon accessing Plaintiff's consumer report, Defendants Credit Corp Solutions Inc did not take any follow-up action, thereby indicating a lack of permissible purpose for those inquiries. Discovery will show Plaintiff never gave any consent to the defendant to access her Consumer report.

Requisite Mental State (Willfulness)

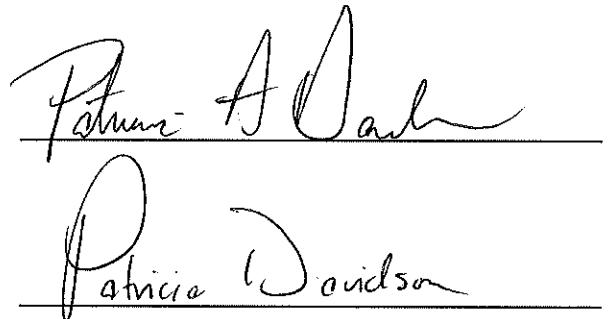
9. Discovery will show despite this knowledge Defendants Credit Corp Solutions Inc. intentionally and recklessly disregarded their obligations under the FCRA and did not verify a purported debt or take other actions that would constitute a permissible purpose of accessing the Plaintiff's consumer report.

10. Plaintiff's injury is "Particularized" and "Actual" in that the conduct deprived Plaintiff of her rights was directed by Defendants to Plaintiff Specifically. Plaintiff's injury is "Particularized" and "Actual" in that Plaintiff has suffered emotional distress from Defendant unauthorized access to her Credit Report.

11. Plaintiff's injury is "Particularized" and "Actual" in that Plaintiff has suffered an invasion of privacy. This intrusion into the "Plaintiff's personal information caused the feeling of vulnerability, worry, and anxiety, which led to sleeplessness and Headaches. Plaintiff's injury is "Particularized" and "Actual" in that the Plaintiff has suffered fear and anger over the invasion of privacy. A favorable decision would serve to deter Defendants from Similar conduct. Also, a favorable decision herein would redress Plaintiff with monetary damages.

12. Wherefore Patricia A. Davidson respectfully demands a jury trial and requests that a Judgment trial and Request Judgement be entered in favor of the Plaintiff against the defendant for (a) actual damages, statutory damages, and potentially punitive damages.

Dated this 19th of April 2024



A handwritten signature in black ink, appearing to read "Patricia A. Davidson". It is written in cursive and includes a stylized "A" in the middle. Below the signature is a typed name.

Patricia A. Davidson

Email: Patricia_Davidson@yahoo.com
Contact # 682-417-1011

Who Has Viewed Your Consumer Information (Continued)

Case 4:24-cv-00362-O-BP Document 1 Filed 04/28/24 Page 4 of 5 PageID 4

Exhibit A

CAPITAL BANK 2275 RESEARCH BLVD STE 600 ROCKVILLE MD 20850 (800) 859 5412 INQUIRY DATES: 03.01.24 | 02.02.23 | 01.03.24 | 12.02.23 | 11.02.23 | 10.02.23 | 09.01.23 | 08.01.23 | 07.03.23 | 06.03.23 | 05.02.23 | 04.04.23 |

CREDIT CORP SOLUTIONS INC 121 W ELECTION RD STE 200 DRAPER UT 84020 No phone # available INQUIRY DATES: 03.01.24 | 01.02.24 | 12.29.23 | 10.06.23 | 10.05.23 | 09.30.23 | 09.21.23 | 09.06.23 | 09.05.23 | 08.13.23 | 08.12.23 | 07.22.23 |

PORTFOLIO RECOV ASSOC 120 CORPORATE BLVD STE 100 NORFOLK VA 23502 (844) 675 3408 INQUIRY DATES: 03.01.24 | 01.02.24 | 12.29.23 | 12.22.23 | 12.10.23 | 10.06.23 | 10.05.23 | 10.02.23 | 09.30.23 | 09.21.23 | 09.08.23 | 09.06.23 | 09.05.23 | 09.01.23 | 08.29.23 | 08.13.23 | 08.12.23 | 07.22.23 | 07.04.23 |

ONEMAIN PO BOX 1010 EVANSVILLE IN 47706 (844) 298 9773 INQUIRY DATES: 02.28.24 | 02.27.24 | 02.10.24 | 01.29.24 | 01.18.24 | 01.13.24 | 01.09.24 | 01.06.24 | 01.05.24 | 01.02.24 | 12.29.23 | 12.22.23 | 12.17.23 | 12.09.23 | 12.06.23 | 11.29.23 | 11.20.23 | 11.06.23 | 10.29.23 | 10.26.23 | 10.27.23 | 10.14.23 | 10.05.23 | 10.04.23 |

SYNCHRONY FINANCIAL 777 LONG RIDGE RD STAMFORD CT 06902 No phone # available INQUIRY DATES: 02.24.24 | 01.05.24 | 12.06.23 |

CREDIT ONE BANK PO BOX 98875 LAS VEGAS NV 89193 (877) 825 3242 INQUIRY DATES: 02.23.24 | 01.25.24 | 12.20.23 | 11.10.23 | 10.27.23 | 09.21.23 | 08.24.23 | 07.28.23 | 07.26.23 | 06.23.23 | 05.19.23 | 04.19.23 |

SYNCHRONY FINANCIAL 4125 WINDARD PLAZA ALPHARETTA GA 30005 No phone # available INQUIRY DATES: 02.21.24 | 01.24.24 | 12.19.23 | 11.21.23 | 10.24.23 | 09.20.23 | 08.22.23 | 07.18.23 | 06.21.23 | 05.23.23 | 04.28.23 | 03.20.23 |

CAPITAL ONE 15000 CAPITAL ONE DR RICHMOND VA 23238 No phone # available INQUIRY DATES: 02.08.24 | 01.11.24 | 12.12.23 | 11.10.23 | 10.17.23 | 09.13.23 | 08.10.23 | 07.13.23 | 06.13.23 | 05.11.23 | 04.12.23 |

EXPERIAN 475 ANTON BLVD COSTA MESA CA 92626 No phone # available INQUIRY DATES: 01.19.24 |

EXPERIAN CS IDENTITY 535 ANTON BLVD COSTA MESA CA 92626 No phone # available INQUIRY DATES: 01.17.24 | 01.02.24 |

EAST TX PROF CU 409 E LOOP 281 LONGVIEW TX 75605 (903) 323 0230 INQUIRY DATES: 01.10.24 | 04.26.23 |

EXPERIAN CREDITMATCH	475 ANTON BLVD # D4	COSTA MESA CA 92626	No phone # available	INQUIRY DATES: 12.26.23 12.25.23 12.22.23 12.21.23												
12.19.23	12.18.23	12.16.23	12.15.23	12.14.23	12.11.23	12.10.23	12.07.23	12.06.23	12.05.23	12.02.23	11.26.23	11.25.23	11.21.23	11.18.23	11.14.23	11.11.23
11.08.23	11.07.23	11.04.23	10.31.23	10.29.23	10.27.23	10.26.23	10.23.23	10.21.23	10.15.23	10.06.23	10.05.23	10.02.23	09.30.23	09.29.23	09.28.23	09.27.23
09.26.23	09.24.23	09.23.23	09.22.23	09.21.23	09.20.23	09.19.23	09.18.23	09.16.23	09.15.23	09.14.23	09.13.23	09.12.23	09.11.23	09.10.23	08.09.23	09.08.23
09.07.23	09.06.23	09.05.23	09.04.23	09.02.23	09.01.23	08.31.23	08.30.23	08.29.23	08.28.23	08.27.23	08.26.23	08.25.23	08.24.23	08.23.23	08.22.23	08.21.23
08.20.23	08.19.23	08.18.23	08.17.23	08.16.23	08.15.23	08.14.23	08.13.23	08.12.23	08.11.23	08.10.23	08.09.23	08.08.23	08.07.23	08.06.23	08.05.23	08.04.23
08.03.23	08.02.23	08.01.23	07.31.23	07.30.23	07.29.23	07.28.23	07.27.23	07.26.23	07.25.23	07.24.23	07.23.23	07.22.23	07.21.23	07.20.23	07.19.23	07.18.23
07.17.23	07.16.23	07.15.23	07.13.23	07.12.23	07.11.23	07.10.23	07.09.23	07.07.23	07.06.23	07.05.23	07.04.23	07.03.23	07.02.23	07.01.23	06.30.23	06.29.23
06.27.23	06.26.23	06.25.23	06.24.23	06.23.23	06.22.23	06.21.23	06.19.23	06.18.23	06.17.23	06.15.23	06.14.23	06.13.23	06.11.23	06.10.23	06.09.23	06.08.23
06.05.23	06.04.23	06.03.23	06.02.23	06.01.23	05.31.23	05.30.23	05.27.23	05.26.23	05.25.23	05.24.23	05.23.23	05.22.23	05.21.23	05.20.23	05.19.23	05.18.23
05.17.23	05.16.23	05.15.23	05.14.23	05.13.23	05.12.23	05.11.23	05.10.23	05.09.23	05.08.23	05.07.23	05.06.23	05.04.23	05.03.23	05.02.23	05.01.23	04.01.23
03.25.23	03.24.23	03.23.23														

CREDIT KARMA	760 MARKET ST FL 2	SAN FRANCISCO CA 94102	No phone # available	INQUIRY DATES: 12.23.23 12.20.23 12.16.23 12.13.23 12.09.23 12.06.23 12.02.23 11.29.23 11.25.23 11.22.23 11.18.23 11.15.23 11.11.23 11.08.23 11.04.23 11.01.23 10.28.23 10.25.23 10.21.23 10.18.23 10.14.23 10.11.23 10.07.23 10.04.23 09.30.23 09.27.23 09.23.23 09.20.23 09.17.23 09.14.23 09.11.23 09.08.23 08.05.23 08.02.23 07.29.23 07.26.23 07.22.23 07.19.23 07.16.23 07.13.23 07.10.23 07.07.23 07.04.23 07.01.23 06.30.23 06.29.23 06.26.23 06.23.23 06.20.23 06.17.23 06.14.23 06.10.23 06.07.23 05.31.23 05.27.23 05.24.23 05.20.23 05.17.23 05.14.23 05.11.23 05.10.23 05.09.23 05.06.23 05.04.23 05.03.23 05.02.23 05.01.23 04.01.23 03.29.23 03.25.23 03.22.23 03.18.23
--------------	--------------------	------------------------	----------------------	--

CLARITY/WESTERN FUND INC 751 WILSHIRE BLVD STE 100 LOS ANGELES CA 90017 No phone # available INQUIRY DATES: 12.21.23 |

CLARITY/WESTLAKE FIN SVC 4751 WILSHIRE BLVD LOS ANGELES CA 90010 No phone # available INQUIRY DATES: 12.21.23 |

CREDIT KARMA INC 760 MARKET ST FL 2 SAN FRANCISCO CA 94102 No phone # available INQUIRY DATES: 12.21.23 | 12.09.23 | 09.13.23 | 09.07.23 | 08.31.23 | 08.28.23 |

CLARITY SERVICES INC 15550 LIGHTWAVE DR CLEARWATER FL 33760 No phone # available On behalf of MONEYKEY (6114) for 30 INQUIRY DATES: 12.19.23 |

CLARITY SERVICES INC No phone # available On behalf of CNU ONLINE HOLDINGS (114 for 30 INQUIRY DATES: 12.19.23 | 05.26.23 |

CLARITY/CCBANK-INTEGRA 3280 N UNIVERSITY AVE PROVO UT 84604 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/CNU ONLINE HOLDING 175 W JACKSON BLVD STE 1000 CHICAGO IL 60604 No phone # available INQUIRY DATES: 12.19.23 | 05.26.23 |

CLARITY/FEB-CREDITFRESH 2150 S 1300 E SALT LAKE CITY UT 84106 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/FEB-CREDITFRESH 2150 S 1300 E SALT LAKE CITY UT 84106 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/FEB-CREDITFRESH 2150 S 1300 E SALT LAKE CITY UT 84106 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/FINWISE-OPPLOANS 820 E 9400 S SANDY UT 84094 No phone # available INQUIRY DATES: 12.19.23 | 05.26.23 |

CLARITY/MONEYKEY 69 YONGE ST STE 1500 TORONTO CN 00000 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/MONEYKEY 69 YONGE ST STE 1500 TORONTO CN 00000 No phone # available INQUIRY DATES: 12.19.23 |

CLARITY/NETCREDIT 175 W JACKSON BLVD STE 1000 CHICAGO IL 60604 No phone # available INQUIRY DATES: 12.19.23 | 05.26.23 |

AFFIRM 650 CALIFORNIA ST FL 12 SAN FRANCISCO CA 94108 (855) 423 3729 INQUIRY DATES: 12.15.23 |

CLARITY SERVICES INC 15550 LIGHTWAVE DR CLEARWATER FL 33760 No phone # available On behalf of FINWISE AMERFIRSTFIN (64 for 30 INQUIRY DATES: 12.15.23 |

CLARITY/FINWISE BANK 820 E 9400 S SANDY UT 84094 No phone # available INQUIRY DATES: 12.15.23 |



